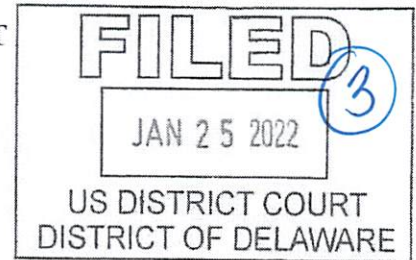


REDACTED

*UNSEALED  
5/4/22 RSI*  
~~SEALED~~

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE



UNITED STATES OF AMERICA,

Plaintiff

v.

MICHAEL JOSEPH WYNDER,

Defendant.

Criminal Action No.

22-08

INDICTMENT

The Grand Jury for the District of Delaware charges that:

Count 1

On or about April 2, 2021, in the District of Delaware, Michael Joseph Wynder, the defendant, in connection with the acquisition of firearms – that is, a Taurus, 380 caliber semi-automatic pistol, model Spectrum, bearing serial number 1F009663; a Diamondback Arms Inc, 9mm semi-automatic pistol, model DB9, bearing serial number YL8758; and a Taurus, 9mm semi-automatic pistol, model G2C, bearing serial number ACA463765 – from First State Firearms and Accessories, LLC, 178 South Dupont Highway, New Castle, Delaware (“First State Firearms”), a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which statement was intended and likely to deceive First State Firearms as to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in that the defendant represented that he was residing in Delaware, at a specific address in New Castle, when, in fact, and as the defendant then knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**Count 2**

On or about April 3, 2021, in the District of Delaware, Michael Joseph Wynder, the defendant, in connection with the acquisition of firearms – that is, a Keltec, .22 semi-automatic pistol, model PMR-30, bearing serial number WXVQ79; and a Charter Arms, .357 caliber revolver, bearing serial number 21J01124 – from First State Firearms and Accessories, LLC, 178 South Dupont Highway, New Castle, Delaware (“First State Firearms”), a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which statement was intended and likely to deceive First State Firearms as to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in that the defendant represented that he was residing in Delaware, at a specific address in New Castle, when, in fact, and as the defendant then knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**Count 3**

On or about April 21, 2021, in the District of Delaware, Michael Joseph Wynder, the defendant, in connection with the acquisition of a firearm – that is, a Taurus, 9mm semi-automatic pistol, model TH9, bearing serial number ACB601925 – from First State Firearms and Accessories, LLC, 178 South Dupont Highway, New Castle, Delaware (“First State Firearms”), a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which statement was intended and likely to deceive First State Firearms as to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in that the defendant represented

that he was residing in Delaware, at a specific address in New Castle, when, in fact, and as the defendant then knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**Count 4**

On or about July 9, 2021, in the District of Delaware, Michael Joseph Wynder, the defendant, in connection with the acquisition of firearms – that is, a Taurus, .22 caliber semi-automatic pistol, model TX22, bearing serial number 1PT434732; a Ruger, 9mm semi-automatic pistol, model Security 9, bearing serial number 384-50281; a Taurus, .38 caliber revolver, model 856, bearing serial number ACB574451; and a Taurus, 9mm semi-automatic pistol, model G3C, bearing serial number ACE874003 – from First State Firearms and Accessories, LLC, 178 South Dupont Highway, New Castle, Delaware (“First State Firearms”), a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which statement was intended and likely to deceive First State Firearms as to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in that the defendant represented that he was residing in Delaware, at a specific address in New Castle, when, in fact, and as the defendant then knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**Count 5**

On or about July 9, 2021, in the District of Delaware, Michael Joseph Wynder, the defendant, in connection with the acquisition of firearms – that is, a Jimenez Arms, 9mm semi-automatic pistol, model J.A. Nine, bearing serial number 296508; a Smith and Wesson, .40 caliber semi-automatic pistol, model SD40VE, bearing serial number FDF9053; a Taurus, 9mm semi-

automatic pistol, model G2C, bearing serial number ACG023892; and a Taurus, 9mm, semi-automatic pistol, model G3, bearing serial number ACG007030 – from American Sportsman, LLC, 2644 Capital Trail, Newark, Delaware (“American Sportsman”), a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which statement was intended and likely to deceive American Sportsman as to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in that the defendant represented that he was residing in Delaware, at a specific address in New Castle, when, in fact, and as the defendant then knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**Count 6**

On or about September 18, 2021, in the District of Delaware, Michael Joseph Wynder, the defendant, in connection with the attempted acquisition of firearms – that is, a Hi-Point, 9mm semi-automatic pistol, model C9, bearing serial number P1948604; a Smith and Wesson, .40 caliber semi-automatic pistol, model SD40VE, bearing serial number FXN1636; a Taurus, .38 Special caliber revolver, model 856, bearing serial number ACH088037; and a Taurus, 9mm semi-automatic pistol, model G2C, bearing serial number ACH119555 – from Starquest Shooters and Survival Supply, 3701 Concord Pike, Wilmington, Delaware (“Starquest”), a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which statement was intended and likely to deceive Starquest as to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter 44, Title 18, United States Code, in that the defendant represented that he was residing in Delaware,

at a specific address in New Castle, when, in fact, and as the defendant then knew, this statement was false and fictitious.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**NOTICE OF FORFEITURE**

Upon conviction of the offenses alleged in Counts 1 through 5 of this Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. 924(d)(1) and 28 U.S.C. 2461(c), the firearms involved in the commission of the offenses and specified in Counts 1 through 5, incorporated herein by reference.

A TRUE BILL:

  
Clerk of Court

DAVID C. WEISS  
United States Attorney

By: 

Edmond Falgowski  
Assistant United States Attorney

Dated: 